



revised 3/24/2009 12:00 PM

FACILITY COMPLIANCE AUDIT REPORT
Division of Waste Management
Solid Waste Section

UNIT TYPE:

Lined MSWLF	LCID	YW	Transfer	Compost	SLAS	COUNTY: Forsyth PERMIT NO.: 34-20 FILE TYPE: COMPLIANCE			
Closed MSWLF	HHW	White goods	Incineration	T&P	FIRM				
CDLF	Tire T&P / Collection	Tire Monofill	Industrial Landfill	X	DEMO				

Date of Audit: March 19, 2009**Date of Last Audit:** March 14, 2007**FACILITY NAME AND ADDRESS:**

Atlantic Scrap and Processing, LLC – Industrial Landfill Reclamation Operation
1426 W. Mountain Street
Kernersville, NC 27284

GPS COORDINATES: N: 36.1384 E: -80.1022**FACILITY CONTACT NAME AND PHONE NUMBER:**

Bill Perry, Regional Manager

w: 336-996-2350

c: 336-655-1211

FACILITY CONTACT ADDRESS:

PO Box 608
Kernersville, NC 27285-0608

AUDIT PARTICIPANTS:

John Patrone, NCDENR – Solid Waste Section (SWS)
Bill Perry, Regional Manager, (Atlantic Scrap and Processing, LLC)
James Winegar, Environmental Manager (OmiSource Southeast)
Bruce Miller, Electrical Supervisor (Metal Tek Development)
Lee Goldstein, Assistant Manager (Atlantic Scrap and Processing, LLC)

STATUS OF PERMIT:

Permit To Construct (PTC) issued August 17, 2004
Permit To Operate (PTO) issued September 2, 2005
Permit extension request letter, dated March 5, 2008, submitted to SWS prior to permit expiration

PURPOSE OF AUDIT:

Comprehensive Audit

NOTICE OF VIOLATION(S):

None.

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

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STATUS OF PAST NOTED VIOLATIONS:

None.

AREAS OF CONCERN AND COMMENTS:

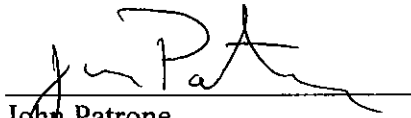
On March 19, 2009, John Patrone met with Bill Perry, James Winegar, Bruce Miller, and Lee Goldstein to conduct a comprehensive audit of the Atlantic Scrap and Processing, LLC - Industrial Landfill Reclamation Operation in Kernersville, Forsyth County.

1. Atlantic Scrap and Processing (ASAP) has been acquired by OmniSource Southeast. Specifics, such as the facility's name/legal entity, are still being worked-out.
2. ASAP is a scrap metal processing yard. A guillotine sheer and a shredder are used to chop metal. Metal is then sorted and shipped-out. General public drop-off material is shipped-out by truck and sheered and shredded metal is shipped-out by railcar. The industrial landfill is located at the rear of the facility's lot.
3. ASAP is permitted to operate an auto shredder residue (ASR) reclamation operation that screens-out ferrous and nonferrous metal from the facility's industrial landfill.
4. Mr. Perry stated that ~ 1/3 of the scrap metal has been reclaimed from the landfill and the remaining 2/3 is scheduled to be reclaimed over the next 2 to 4 years.
5. The facility's reclamation process is not currently in operation and has not operated in the past year. The facility is constructing improved metal screening equipment and is scheduled to begin operation in May 2009.
6. The facility will excavate and refill the interior of the ASR landfill, leaving the banks intact (the banks will be pulled-in in order to reclaim material but maintained/reconstructed to limit runoff).
7. The ASR reclamation operation is part of the facility's closure process. Daily and intermediate cover is not required unless windblown material is evident.
8. The facility's site plan was reviewed and its operations plan discussed. The industrial landfill has ~ a 16 acre footprint and is ~ 75 feet deep.
9. The facility's permit authorizes the reclamation of ASR. Material that is removed and not deemed marketable may be returned to the landfill. The permit does not authorize the disposal of any other solid waste. Waste material from other ASAP operations (on-site) are regularly shipped-out to BFI - Charlotte Motor Speedway Landfill (No. 13-04).
10. The facility will place its in-feed stockpile adjacent to the reclamation equipment, atop the landfill.
11. The facility maintained records of the amount of material removed and recovered from the landfill. The amount of material removed less the amount of material recovered is equal to the amount of material returned to the landfill. In 2006 and 2007 the facility averaged 2.32 percent reclaimed product. In 2006 (operating ½ of the year) the facility processed 35,150,190 lbs and in 2007 it processed 807,377,940 lbs. The facility reclamation operation did not operate in 2008. Mr. Perry was reminded that daily, monthly, and annual records must be maintained for the amount of material removed from the landfill, recovered, and returned to the landfill.
12. Reclaimed product will be covered until shipped off site.
13. The facility plans to collect product fines. The commingled fines will be used for the top layer of the landfill. A catch basin will control runoff from the stockpiled fines.
14. The Kernersville Fire Department will respond to a fire and, if necessary, the facility has a fire hydrant on-site.
15. There was no indication of soil erosion. The facility has constructed numerous catch basins, including a series of catch basins adjacent to the new reclamation equipment (downgrade from the landfill).
16. Proper signage was posted at the entrance to the landfill (reclamation operation) area.
17. The site is secured by a gate.

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Please contact me if you have any questions or concerns regarding this audit report.


John Patrone
Environmental Senior Specialist
Regional Representative

Phone: 336-771-5095 Fax: 336-771-4631

Delivered on : <u>March 25, 2009</u> by	<input checked="" type="checkbox"/>	Email		US Mail		Certified No. <input type="checkbox"/>
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central Regional Supervisor
Donald Herndon, Compliance Officer
Geof Little, Environmental Engineer
James Winegar, Environmental Manager, OmniSource Southeast